

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>DEBORAH PEATE, a/k/a "Deborah Dorsey"</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. §1344 (bank fraud - 1 count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. Manufacturers and Traders Trust Company, also known as M&T Bank ("M&T Bank"), is a financial institution which, at all times material to this indictment, maintained offices in Blue Bell, Pennsylvania and elsewhere and had accounts insured by the Federal Deposit Insurance Corporation, Certificate No. 588.

2. Between in or around November 2002, to in or around April 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

**DEBORAH PEATE,  
a/k/a "Deborah Dorsey,"**

knowingly executed and attempted to execute a scheme to defraud M&T Bank and to obtain money owned by and under the care, custody and control of the bank by means of false and fraudulent pretenses, representations and promises.

**THE SCHEME**

3. In or around November 2002, defendant DEBORAH PEATE represented to M&T Bank that she was engaged in the operation of several businesses and required banking services.

4. In or around November 2002, defendant DEBORAH PEATE caused multiple business accounts to be opened at M&T Bank, including the following checking accounts:

<u>Name of Account</u>	<u>Account No.</u>
D&D Food for Your Soul Co., Inc.	*****9162
Dorsey Contracting Co., Inc.	*****9220
Tomboys Greeting Cards and Accessories Co.	*****9212

5. Defendant DEBORAH PEATE fraudulently inflated the balances in the accounts at M&T Bank by causing deposits to be made with checks from other financial institutions that were written on accounts that were closed and on accounts in which there were insufficient funds.

6. Defendant DEBORAH PEATE negotiated and caused the negotiation at M&T Bank of fraudulent checks written on accounts at other financial institutions. The fraudulent checks were written on closed accounts and on accounts in which there were insufficient funds.

7. Defendant DEBORAH PEATE caused fraudulent checks written on M&T Bank accounts to be provided to others, negotiated at financial institutions other than M&T Bank and presented to M&T Bank for payment. The fraudulent checks were written on M&T Bank accounts in which there were insufficient funds.

8. Defendant DEBORAH PEATE made and caused to be made withdrawals from M&T Bank accounts with fraudulently inflated balances or insufficient funds.

9. Defendant DEBORAH PEATE caused a loss to M&T Bank of over \$15,000.

In violation of Title 18, United States Code, Section 1344.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**